

**STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD**

IN RE:	:	
	:	
REVIEW OF ELECTRIC INTERCONNECTION OF DISTRIBUTED GENERATION FACILITIES RULES [199 IAC CHAPTER 45]	: : : : :	DOCKET NO. RMU-2016-0003

**MIDAMERICAN ENERGY COMPANY’S STATEMENT OF POSITION IN RESPONSE
TO IOWA UTILITIES BOARD’S OCTOBER 18, 2016 ORDER REQUESTING
ADDITIONAL COMMENTS**

In response to the Iowa Utilities Board’s (“Board”) October 18, 2016 Order Requesting Additional Comments (“Order”) of the Board’s proposed changes to its “Electric Interconnection of Distributed Generation Facilities” rules and subsequent stakeholder comments, MidAmerican Energy Company (“MidAmerican”) files these reply comments.

MidAmerican supports Interstate Power and Light Company’s November 7, 2016 comments (“IPL November Comments”). IPL’s “affected systems” clarifications more effectively ensure coordination between interconnection customers and all levels of the energy grid.¹ As noted in the Order and in the IPL November Comments, further analyzing, understanding, and addressing an interconnection customer’s impact on affected systems will help proactively mitigate future electric grid reliability concerns. Adding the “affected system” language will promote energy grid safety and reliability, and encourage continued transparency among stakeholders. The Board should adopt the “affected system” language proposed by IPL.

¹ “Affected system” means an electric system not owned or operated by the utility reviewing the interconnection request that could suffer an adverse system impact from the proposed interconnection. 199 IOWA ADMIN CODE 45.1 (2016).

As all stakeholders strive to build a smarter, safer, and more reliable electric grid, greater sharing of information between interconnection customers and utilities is critical. For example, IPL proposes to collect additional information from interconnection applicants such as (but not limited to): ownership structure, meter number, whether the proposed interconnection is an expansion of an existing system, AC nameplate capacity, system output and impacts, and inverter-based facility information. IPL November Comments at 4-6. MidAmerican supports these changes to gain additional information from the interconnecting customer.

Finally, MidAmerican again requests Board clarification regarding how Pre-Application Reports, Interconnection Applications and Agreements, and Supplemental Review Requests will be modified in the future, if they are moved to the Board's website from the Chapter 45 appendices. With these forms no longer part of the written Chapter 45 rules, it is unclear whether the forms will still be subject to Board's rule-making processes.²

WHEREFORE, for the foregoing reasons MidAmerican respectfully requests that the Iowa Utilities Board consider the foregoing comments and finalize this rulemaking.

Dated this 17th day of November, 2016.

Respectfully submitted,

MidAmerican Energy Company

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² See e.g., IPL November Comments at 3.